

FILED IN OPEN
COURT 3/24/06
KJC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Complaint No. 06- 36M

SILVIA LANDA-MARTINEZ,

Defendant.

MOTION FOR DETENTION HEARING

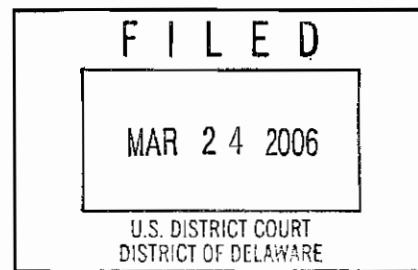
NOW COMES the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. § 3156)
- Maximum sentence life imprisonment or death
- 10+ year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- Defendant's appearance as required
- Safety of any other person and the community



3. **Rebuttable Presumption**. The United States will not invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (check one or both):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing**. The United States requests the court conduct the detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

DATED this 24th day of March, 2006.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: 
Adam Safwat
Assistant United States Attorney